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Attorneys for Defendant Ronald Maldonado

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

RONALD MALDONADO,

Defendant.

Case No.: 3:07-cr-00089-CRB

STIPULATION AND ~~PROPOSED~~ ORDER  
CONTINUING DATE FOR CHANGE OF  
PLEA HEARING

The parties hereby stipulate and request that the date currently set for change of plea and sentencing in this matter, June 27, 2007 at 2:15 PM before the Honorable Charles R. Breyer be continued to July 11, 2007 due to a conflict in undersigned defense counsel's schedule. The parties respectfully request that the hearing be re-set for July 11, 2007 at 2:15 PM.

The parties have entered into a waiver of the five year statute of limitations period for the purpose of attempting to reach a negotiated disposition of the potential criminal charges against the Defendant. Accordingly the parties further agree and stipulate that if the Court does not accept the sentence of 12 months home confinement that the parties have agreed to in the proposed plea agreement (tendered to the court on March 20, 2007), which the parties anticipate entering into pursuant to Fed. R. Crim. P. 11(c)(1)(C), then the statute of limitations shall also be

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1 tolled from March 20, 2007 until 14 days after the date the Court notifies the parties that it does  
2 not intend to accept the plea agreement.

3 Dated: March 27, 2007

Respectfully submitted,

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6 /s/: Nanci Clarence  
Nanci L. Clarence  
Attorney for  
Defendant Ronald Maldonado

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9  
10 Dated: March 27, 2007

/s/: Robin Harris  
Robin L. Harris  
Assistant United States Attorney

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13  
14 **~~PROPOSED~~ ORDER**

15 Good cause having been shown, the Court hereby GRANTS the request that the hearing  
16 for change of plea and sentencing previously set for June 27 at 2:15 PM shall be continued to  
17 July 11, 2007 at 2:15 PM.

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19 Dated: March 28, 2007

